

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF ARKANSAS  
WESTERN DIVISION

**FILED**  
U.S. DISTRICT COURT  
EASTERN DISTRICT ARKANSAS

FEB 25 2013

JAMES W. McCORMACK, CLERK  
By: Saw  
PLAINTIFF DEPT CLERK

KIMBERLY TURNER

VS.

NO. 4:13-cv-91 BSM

CRETE CARRIER CORPORATION

DEFENDANT

COMPLAINT

Plaintiff, for her complaint against defendant, states:

1. Plaintiff is a citizen and resident of the Eastern District of Arkansas.
2. Defendant is a corporation organized under the laws of Nebraska with its principal place of business in Nebraska. This case assigned to District Judge Miller and to Magistrate Judge Volpe
3. The amount in controversy, exclusive of interest and costs, exceeds \$75,000.
4. The events complained of herein occurred in the Eastern District of Arkansas.
5. On July 7, 2012, plaintiff was driving her vehicle in a northerly direction on Interstate 30 near E. 19<sup>th</sup> St. in North Little Rock, Arkansas. At the same time, Stacy Jeffress was driving a tractor trailer rig in the same direction. Stacy Jeffers drove his tractor trailer rig into the rear of plaintiff's vehicle.
6. Stacy Jeffress was, at all relevant times, an agent or employee of the defendant and the defendant is vicariously liable for his conduct.
7. Stacy Jeffress was negligent in following too closely, traveling too fast for existing conditions, failing to keep a proper lookout, and failing to yield the right of way.
8. As a proximate result of the negligence of Stacy Jeffress, plaintiff has sustained

damages. She has incurred medical expenses and will do so in the future, has lost wages and will do so in the future, has lost earning capacity, has suffered pain and mental anguish and will do so in the future, has scars and disfigurement and has sustained a permanent injury. She also sustained property damage to her vehicle.

9. Plaintiff demands a trial by jury.

WHEREFORE, plaintiff prays judgment against defendant in an amount in excess of \$75,000, for her cost and all other proper relief.

Respectfully submitted,

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